

SCPPA South Carolina Pulp & Paper Association

Post Office Box 118005, Charleston, SC 29423

Via Federal Express

June 8, 2007

Bowater
Inc.

Mr. Thomas J. Flynn, III
South Carolina DHEC
Bureau of Air Quality
2600 Bull Street
Columbia, SC 29201

International
Paper

Re: Network Description and Ambient Air Network Monitoring Plan
Calendar Year 2008 Review

Sonoco

Dear Mr. Flynn:

Smurfit-Stone
Container
Corporation

The attached comments are provided on behalf of the South Carolina Pulp and Paper Association (SCPPA) regarding the draft *Network Description and Ambient Air Network Monitoring Plan / Calendar Year 2008 (Plan)*. This plan, developed by the South Carolina Department of Health and Environmental Control (SC DHEC), was recently released for public comment. In addition to the written summary comments, a “redline” of the draft plan is attached showing the changes that SCPPA believes are warranted.

MeadWestvaco
Corporation

Domtar

SCPPA members operate seven major manufacturing facilities in South Carolina and provide employment for over 13,000 South Carolinians. The comments provided in this submittal do not preclude member companies from submitting additional comments directly or through other associations with which they are affiliated. Comments from other stakeholder groups with SCPPA members are anticipated, because of the regional nature of the ambient air monitoring network.


Because of the tightening of ambient air quality standards and the likelihood that this trend will continue, SCPPA member companies are acutely aware of the importance of the monitoring network. Attainment status designation can have a dramatic economic impact on a given geographic region. The ability of SCPPA member facilities to expand or new facilities to locate in an area is directly related to these designations. The monitoring network also provides background ambient air concentrations for New Source Review evaluations. The ambient air monitoring network is therefore critically important for these reasons, in addition to serving as the foundation for many public health and non-regulatory environmental decisions.

The challenges to review the monitoring network are acknowledged as very complex. SCPPA feels that SC DHEC did a very thorough job in evaluating the basic federal requirements for the network and recommending appropriate changes. Likewise, the ETC feels that the monitor instrument accuracy has been sufficiently reviewed. There does remain a concern by SCPPA that the network review has not included sufficient changes regarding monitor siting; or simply stated, the critical locations where the air quality samples are taken. The attached comments and redline plan provide specific recommendations to this point.

SCPPA would like to commend SC DHEC for the opportunities provided to all stakeholders to participate in this monitoring plan review. The approach used for the evaluation of a number of monitors with siting concerns was exceptional. This allowed the monitor sites to be audited in the field by joint stakeholder and SC DHEC staff teams, using agreed upon regulatory and guideline criteria. A summary of the results of these audits is also attached. SCPPA also commends the personal involvement of a number of key members of the Bureau of Air Quality leadership team in this review.

SCPPA appreciates your careful consideration of and response to these comments, including the specific recommended changes shown in the redline plan. If you have any questions, please feel free to call me at (843) 745-3139 or electronically at dam20@meadwestvaco.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Mummert', with a long horizontal stroke extending to the right.

Duane Mummert, P. E.
Chair, SC Pulp and Paper Association

Attachments: SCPPA's Comments on the Plan
Siting/Network Analysis Checklist
Redline copy of the Plan

cc: SCPPA Members